

# BLANKROME

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December 12, 2019

## **VIA ECF**

Hon. Lois H. Goodman  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Sandoz, Inc. and RareGen, LLC v. United Therapeutics Corporation  
and Smiths Medical ASD, Inc., Civil Action No. 3:19-cv-10170 (BRM) (LHG)**

Dear Judge Goodman:

On behalf of Defendants United Therapeutics Corporation and Smiths Medical ASD, Inc., we write with regard to Defendants' pending Opposed Motion to Seal ("the Motion"), which seeks to seal and redact several docket entries related to the parties' briefing on Plaintiffs' Motion for Preliminary Injunction. (See ECF No. 151).

At the hearing held on December 10, 2019 before Judge Martinotti, the parties modified their positions on confidentiality. In light of those positions, Defendants wish to narrow significantly the scope of their sealing request. Accordingly, Defendants intend to submit a revised Index and proposed redactions to the Court.

Therefore, to avoid wasting judicial resources deciding a sealing or redaction request that may be moot, Defendants request that the Court adjourn the December 16, 2019 return date to the next available return date, which is January 6, 2020. Based on that new return date, Defendants will submit their narrower Index and proposed redactions by December 30, 2019. If this revised schedule meets with Your Honor's approval, Defendants request that the Court "So Order" this letter to the docket.

Respectfully submitted,

/s/ Stephen M. Orlofsky  
STEPHEN M. ORLOFSKY

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The Honorable Lois H. Goodman, U.S.M.J.

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Cc: Counsel of Record (via ECF)